



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

October 12, 2022

BY ECF

The Honorable Vernon S. Broderick
United States District Court, Southern District of New York
40 Foley Square
New York, NY 10007

RE: Goldstein v. Hochul, et al., No. 20-cv-8300

Dear Judge Broderick:

This Office represents Defendants Governor of New York State Kathy Hochul and New York Attorney General Letitia James (the “State Defendants”) in the above-captioned action where in Plaintiffs challenge a provision of the Concealed Carry Improvement Act (“CCIA”) prohibiting the carrying of firearms in places of worship. On October 3, 2022, the Court issued an order directing that the defendants show cause why the challenged provision of the CCIA not be enjoined during the pendency of this action. (ECF no. 21.) Defendants’ opposition papers are due on October 14, 2022.

State Defendants write to request an enlargement of their papers responding to the Court’s Order and opposing Plaintiffs’ request for a preliminary injunction. Specifically, State Defendants request that (a) the page limit of their memorandum of law be increased from 25 pages to 30 pages; and (b) the page limit of their supporting declaration be increased from 10 pages to 15 pages. The reason for the requested enlargement is that additional space is needed to respond to the multiple causes of action that Plaintiffs have raised in their preliminary injunction brief (which totaled 29 pages), and to submit to the Court evidence that the challenged provision of the CCIA is grounded in historical law and tradition, as required by the Supreme Court in NYSRPA v. Bruen, 142 S. Ct. 2111 (2022).

Plaintiffs consent to the requested enlargement.

The State Defendants appreciate the Court’s attention to this matter.

Respectfully submitted,

/s/ Matthew L. Conrad
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Honorable Vernon S. Broderick
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